

MEMO ENDORSED



William Cafaro, Esq.
Partner
ADMITTED IN NY, CA, MD & TX
Email: bcafaroc@cafaroescq.com

Amit Kumar, Esq.
Managing Attorney
ADMITTED IN NY & NJ
Email: akumar@cafaroescq.com

Andrew S. Buzin, Esq.
Of Counsel
ADMITTED IN NY, FL & DC

108 West 39th Street, Suite 602
New York, New York 10018
Telephone: 212.583.7400
Facsimile: 212.583.7401
www.cafaroescq.com

Louis M. Leon, Esq.
Associate
ADMITTED IN NY
Email: lleon@cafaroescq.com

Matthew S. Blum, Esq.
Of Counsel
ADMITTED IN NY
Email: mblum@cafaroescq.com

May 20, 2021

Via Electronic Case Filing

Hon. Valerie E. Caproni
United States District Court
Southern District of New York
40 Foley Square
New York, New York 10007

Re: *Ramirez v. 400 West 23rd Street Restaurant Corp. et al.*
Case No.: 1:19-cv-10571 (VEC)

Your Honor:

This firm represents the Plaintiff in the above-referenced wage and hour matter against Defendants. We write, jointly with Defendants, to request that the discovery deadline be extended from May 27th to July 26th, and that next week's pretrial conference be adjourned to after the close of discovery. This is the parties' first request for an extension of any of these deadlines.

In light of Defendants' limited resources and the fact that their business shutdown during the COVID-19 pandemic, the parties have been engaged in diligent settlement discussions. It is very likely that there will be a settlement in principle within the next week or so. If the parties do arrive at a settlement, they will promptly inform the Court. If there is no settlement, the parties will proceed to finish any remaining discovery. The parties do not anticipate needing more time than is being requested to finalize this matter or alternatively push it forward.

We thank the Court for its attention and consideration to this request.

Respectfully Submitted,

/s/
Louis M. Leon, Esq.

Fact discovery must be complete by no later than **Friday, July 23, 2021**. No further adjournments.

The pre-trial conference currently scheduled for Friday May 28, 2021 at 9:30 A.M. is hereby adjourned to **Friday, July 30, 2021 at 11:00 A.M.** Pre-conference submissions are due no later than **Thursday, July 22, 2021**. For information about the requirements of the pre-conference submissions, the parties should consult the Case Management Plan at docket entry 30.

All parties and any interested members of the public must attend the July 30, 2021 conference by dialing 1-888-363-4749, using the access code 3121171, and the security code 0571. All attendees are advised to mute their phones when not speaking and to self-identify each time they speak. Recording or rebroadcasting the proceeding is strictly prohibited by law.

SO ORDERED.

A handwritten signature in blue ink, appearing to read "Valerie Caproni".

Date: May 20, 2021

HON. VALERIE CAPRONI
UNITED STATES DISTRICT JUDGE